

Remarks

Claims 1-20 are pending in the application and the same are rejected.
Claims 1-20 are presented for review and further consideration by the Examiner.

The Examiner has rejected claims 1-20 under 35 U.S.C. § 102(e) as being anticipated by Simon, U.S. Patent No. 6,065,008. The Examiner states that Simon teaches opening a printer metrics file, reading one set of the at least one set of font metrics from the printer metrics file, and creating an operating system font from the one read set of font metrics (Examiner's Action, page 2, ¶ 2).

Applicants respectfully disagree.

Simon discloses a system and method for secure font subset distribution. Simon describes a font creator, a font distributor, and a client (col. 3, lines 50-52). The font creator develops "digitally signed font files that can be delivered to and used by the font distributor" (col. 3, lines 57-58). The font distributor then receives the font file created by the font creator and distributes the digitally signed font file, or a subset of that file, to the client (cols. 3-4, lines 57-10). After receiving the digitally signed font file or subset of the digitally signed font file, the client stores the file in memory (col. 5, lines 28-29). The client executes an operating system, which contains an authentication module (col. 5, lines 14-26). The authentication module reconstructs the root of the authentication tree and the authentication values contained in the font subset file (col. 5, lines 29-32). The authentication module compares the root from the font subset file and the reconstructed root (col. 5, lines 33-35). If the roots match, the file is authenticated. If they do not, the file is not authenticated (col. 5, line 33-35).

The Examiner suggests that the font file 50 of Simon is a printer metrics file. Conventionally, font files contain all of the information necessary for creating a font, including glyph outlines, usage restrictions, metrics, and so forth. Whereas printer metrics files contain only the metrics of one or more printer fonts, such as the selection string, character set, point size, scalability, width,

and height of each printer font and whether each printer font is bolded, italicized, or both. Furthermore, Simon does not disclose that the font file 50 is a printer metrics file. Therefore, font file 50 is not an appropriate analog to the printer metrics file of Applicants' claims. Since Simon does not disclose a printer metrics file, Simon does not teach opening a printer metrics file.

Additionally, Simon does not disclose reading one set of font metrics from either a printer metrics file or font file 50. While the Examiner states that the signing module 48 of Simon would inherently read information from font file 50 of Simon, nowhere does Simon specifically disclose reading a set of font metrics from font file 50. Furthermore, given the purpose of Simon, to securely distribute a font subset, there is no reason for the method disclosed in Simon to read a set of font metrics from font file 50. Reading the font metrics is neither necessary to subsetting a font, nor authentication of the font subset.

In addition, Simon does not disclose creating an operating system font from a read set of font metrics. Rather, Simon discloses authenticating an already existing font subset file. There is no disclosure in Simon of creating an operating system font from a font metrics file. Furthermore, as discussed above, Simon does not disclose reading a set of font metrics from which an operating system font may be created.

In contrast, Applicants' invention as expressed in independent claims 1, 8, and 14 involves creating an operating system font by opening a printer metrics file, reading one set of font metrics from the printer metrics file, and creating an operating system font from the one read set of font metrics.

Unlike Applicants' invention, Simon does not open a printer metrics file; Simon does not read font metrics contained in the printer metrics file; and Simon does not create an operating system font from the font metrics. Accordingly, Simon contains none of the limitations or elements of Applicants' invention and is therefore an improper basis for an anticipation rejection under 35 U.S.C. §

102(e).

In view of Applicants' arguments with respect to independent claims 1, 8, and 14 being allowable, Applicants respectfully submit that the remaining dependent claims are also allowable because they contain all of the limitations of their respective independent claims and further add structural and functional limitations.

The foregoing arguments are believed to be a complete response to the outstanding Examiner's Action.

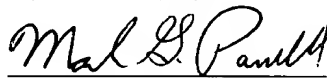
No new matter has been added.

It is respectfully submitted that there is no claim, teaching, motivation, or suggestion in any of the cited art, alone or in combination, to produce what Applicants claim.

It is further submitted that the application defines patentable subject matter and that the claims are in a condition for allowance. Such allowance at an early date is respectfully requested.

Should any issues remain which would preclude the prompt disposition of this case, it is requested that the Examiner contact the undersigned practitioner by telephone.

Respectfully submitted,
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Response A